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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BRUCE MACDONALD, Individually and
 on Behalf of All Others Similarly Situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC.,
 a Delaware corporation, TEZOS
 STIFTUNG, a Swiss Foundation,
 KATHLEEN BREITMAN, an
 Individual, ARTHUR BREITMAN,
 an Individual, TIMOTHY COOK
 DRAPER, an individual, DRAPER
 ASSOCIATES, JOHANN GEVERS,
 DIEGO PONZ, GUIDO SCHMITZ-
 KRUMMACHER, BITCOIN SUISSE AG,
 NIKLAS NIKOLAJSSEN and DOES 1-100,
 INCLUSIVE,

Defendants.

No. 17-cv-07095-RS

CLASS ACTION

**DECLARATION OF REED R. KATHREIN
 IN SUPPORT OF MOTION FOR
 EXPEDITED DISCOVERY**

JUDGE: Hon. Richard Seeborg
 DATE: February 15, 2018
 TIME: 1:30 p.m.
 CTRM: 3, 17th Floor

I, REED R. KATHREIN, hereby declare as follows:

1. I am an attorney duly licensed to practice before all the courts of the state of California. I am a member of the law firm of Hagens Berman Sobol Shapiro LLP, Counsel of record for Plaintiff Bruce Macdonald in the above-entitled action. I have personal knowledge of the matters stated herein, and, if called upon, I could and would competently testify thereof.

2. Because of the imminent possibility of irreparable injury and the dissipation of assets available to all Class Members, and the need to clarify jurisdictional matters, Plaintiffs seek an order expediting discovery.

3. Attached hereto are true and correct copies of the following documents referenced in Plaintiffs' Motion for Expedited Discovery, filed herewith:

Exhibit A: A Tezos Community Statement entitled "The Story and Voice of the Tezos Community", published on the Tezos website on December 20, 2017;

Exhibit B: A Tezos Community Statement entitled "Community Petition Statement", published on the Tezos website on December 4, 2017;

Exhibit C: An article from finews.com entitled "Tezos: «Klepto Valley» Character Smears", published on December 20, 2017;

Exhibit D: An article from swissinfo.ch entitled "Pressure mounts on Tezos Foundation head Gevers", published on December 22, 2017;

Exhibit E: An article from swissinfo.ch entitled "Gevers fights Monetas bankruptcy proceedings", published on January 3, 2018.

4. Based on the publicly available information referenced above and filed concurrently with this declaration, Plaintiffs believe there are over 1,400 individuals who have sustained losses in excess of \$1 billion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 10th day of January, 2018, at Berkeley, California.

By: /s/ Reed R. Kathrein
REED R. KATHREIN

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 10, 2018.

By: /s/ Reed R. Kathrein

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